

David E. Patton
Executive Director

Southern District of New York
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Attorney-in-Charge

March 24, 2023

VIA ECF

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
40 Foley Square

**Re: USA v. Yaneris Hernandez
22 Cr. 439 (JPO)**

Honorable Judge Oetken:

With the consent of the Government, I write to respectfully request that the Court adjourn the upcoming status conference for a period of approximately 30 days. The status conference is currently scheduled for March 28, 2023.

The government has extended a plea offer that the defense needs additional time to discuss and consider. An adjournment will provide the defense with sufficient time to review, discuss and make a decision on the offer before the need to set a motions schedule or trial date. I am available the week of May 1 (except May 3 at 2PM).

The defense consents to the exclusion of time under the Speedy Trial Act until the date of the next status conference.

Thank you for your consideration of this matter.

Granted. The March 28, 2023 pretrial conference is adjourned to May 2, 2023 at 4:45 pm. The Court hereby excludes time through May 2, 2023, under the Speedy Trial Act, 18 USC 3161(h)(7)(A), finding that the ends of justice outweigh the interests of the public and the defendant in a speedy trial.
Dated: 3/27/2023

Respectfully submitted,

Zawadi Baharanyi
Assistant Federal Defender
(917) 612-2753

SO ORDERED:

cc: AUSA Kevin Mead.


J. PAUL OETKEN
United States District Judge